



School of Public Policy & Administration

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Hon. Julius Genachowski, Chairman  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

*Via Electronic Filing*

**Re: MB Dkt 09-182, 2010 Quadrennial Review – Review of the Commission’s  
Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the  
Telecommunications Act of 1996**

Dear Commissioner Genachowski:

Today I have filed a comment that contains a report entitled ***Local TV News & Service Agreements: A Critical Look***. The research examines the effect of formal news-sharing arrangements such as shared services agreements (SSA) and local management/marketing (LMA) agreements on local television news content in eight randomly selected television markets in the country. I believe that the research addresses an area of market structure that has important implications for the Commission’s consideration of the media ownership rules within the Quadrennial Review.

In June and July 2011, the Commission released the results of several studies on media ownership that it said would provide the basis for decision-making and policy formulation for the Quadrennial Review. I examined the studies very carefully. None of the studies addressed the phenomenon of these news and resource sharing agreements, which include, in addition to those mentioned above, Joint Services Agreements (JSA) and Local News Sharing Agreements (LNS). The FCC’s Study 4, entitled Local Information Programming and Structure of Television Markets, mentions the phenomenon, but it does not address its effects. Respectfully, I suggest that the Commission needs to consider the effect of these agreements on competition, diversity and localism because, as I found, (in this analysis and in my examination of the SSA in the Honolulu market) they do affect local television news where they operate. That is their stated purpose. And they operate in, at least, 83 markets across the country.

Thank you very much for your consideration.

Respectfully submitted,

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